

## **CONNECTION SYSTEM FOR FIREPROOFED ELECTRONIC DEVICE**

### **REMARKS**

This paper addresses the rejections stated in the final Office Action mailed November 16, 2005. Claims 1-15, 32, and 33 are pending in this application and currently stand rejected. New claims 33 and 34 have been added by this amendment. Upon entry of this paper, claims 1, 3-7, 9-15, and 32-35 will remain pending in this application. Claims 3-6, 34, and 35 are dependent on claim 1; claims 9-15 are dependent on claim 7; and claim 33 is dependent on claim 32.

No new matter has been added by this amendment paper.

### **Claim Objections**

Claims 1, 4, 5, 7, 32, and 33 were objected to because of certain informalities as identified by the Examiner. Applicants are grateful for the Examiner's identification of these informalities, and for making useful suggestions. Accordingly, Applicants have amended these claims as required by the Examiner.

### **Claim Rejections - 35 U.S.C. § 112**

Claims 1-6, and 32-33 were rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. The Examiner states that the claim(s) contain subject matter which was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor(s), at the time the application was filed, had possession of the claimed invention. Specifically, the Examiner has identified the phrase "free ends" as being new matter because the original disclosure in specification nor drawings showed free ends of the elongate member that are connected by the heat sensitive material.

Applicants have amended independent claims 1 and 32 removing references to the phrase "free ends" thereby rendering them compliant with the written description requirement under 35 U.S.C. § 112, first paragraph, and therefore patentable. Accordingly, dependent claims 3-6 and 33 are also believed patentable at least for the reason that they are dependent upon allowable base claims. Claim 2 has been canceled without prejudice or disclaimer.

In view of the foregoing, reconsideration and withdrawal of the rejections under 35 U.S.C. § 112, first paragraph, is respectfully solicited.

**Claim Rejections - 35 U.S.C. § 102**

Claims 1-3, 5-9, and 15 were rejected under 35 U.S.C. § 102(b) as being anticipated by Oravala (US Patent 5,638,250).

With regards to claim 1, the Examiner states that Oravala discloses a connection system comprising a heat conductive structure configured to transfer a communication signal, the heat conductive structure including first and second elongate conductors aligned longitudinally with free ends of the elongate conductors adjacent to each other and a connection point coupled between the free ends of the elongate member, the connection point including a heat sensitive material, wherein heat applied to the heat conductive structure modifies the heat sensitive material to thermally separate the free ends of the elongate member at the connection point.

Additionally, with regards to claim 2, the Examiner states that Oravala discloses a connection system further comprising a biasing member configured to apply a tension force at the connection point.

Addressing first the rejection of claim 2, Applicants respectfully disagree with the Examiner's determination. In Oravala, Applicants did not find any references, as suggested by the Examiner, to biasing members and/or to the application of tension forces for separating the elongate members at the connection point when the heat sensitive material melts. However, what Oravala does appear to teach is a "...pressure fuse..." configuration wherein the application of force such as pressure, stress, strain, tug, pull, or the like, will cause a break in the leads, the conductor, or between the second lead and the conductor and not by any other means. In other words, the break in the leads of Oravala is caused by the application of pressure and not due to a means such as increased temperature. For instance, Oravala states:

"The fuse structure...also operates as a pressure fuse..." such that "...if pressure is formed..." it may "...cause the core lead to be released..." and "...one of the joints or the fusible portion 9 breaks, and thus the connection between the lead 7 and the conductor 8 is broken." (col. 4, lines 6-15)

In contrast thereto, the biasing member disclosed in the present application provides a tension force separating, both electrically and thermally, a first and second member such as elongate conductors, elongate wire members, and the like. The functioning of the biasing member, as applicable in the present invention, is described in paragraph [0027] of the original specification which, in part, defines the term “biasing member” “...as a member or device that expends a biasing force, such as a force provided by a spring that when moved beyond a rest state provides a biasing force in an attempt to return to the rest state.”

Nonetheless, in the spirit of cooperation for moving this application towards allowance, Applicants have canceled claim 2 without prejudice or disclaimer, and amended independent claim 1 to now include the additional limitation of “...a biasing member configured to apply a tension force relative to the elongate conductors.” Support for this amendment may be found in paragraph [0031] of the original specification, and also in the abstract which, in part, states: “...The heat sensitive material is modified when heat is applied to the heat conductive wire such that the tension force from the biasing member thermally separates the heat conductive wire.”

As can be seen, Oravala does not disclose or suggest every limitation of amended claim 1. Therefore, Applicants believe claim 1 is not anticipated by, and is patentable over, Oravala. Accordingly, Applicant submit that claims 3, 5, and 6 also are not anticipated by, and are therefore patentable over, Oravala for at least the reason that they are dependent upon an allowable base claim.

With regards to claims 7 and 8, the Examiner’s reasons for rejection are substantially similar to those for rejecting claims 1 and 2. In an effort to move this application towards allowance, Applicants have canceled claim 8 without prejudice or disclaimer, and amended independent claim 7 to now include the additional limitation of “...a biasing member configured to apply a tension force to the heat conductive structure at the connection point.” Again, Oravala does not disclose or suggest every limitation of amended claim 7. Therefore, Applicants believe claim 7 is not anticipated by, and is patentable over, Oravala.

With regards to claims 9 and 15, Applicant submit these claims also are not anticipated by, and are therefore patentable over, Oravala for at least the reason that they are dependent upon an allowable base claim.

In view of the foregoing, reconsideration and withdrawal of the rejections under 35 U.S.C. § 102 is respectfully solicited.

### **Claim Rejections - 35 U.S.C. § 103**

Claim 4 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Oravala (US Patent 5,638,250) in view of Bone et al. (US Patent 6,317,307). In the present application, claim 4 is dependent upon claim 1. As discussed in the foregoing, Oravala fails to disclose or suggest every limitation of amended claim 1. Therefore, Applicants believe that claim 4 is allowable at least for the reason that it is dependent upon an allowable base claim.

Claims 10-14, 32, and 33 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Oravala (US Patent 5,638,250) in view of Hastings et al. (US Patent 4,748,915). Applicants respectfully traverse this rejection.

In the present application, claims 10-14 are dependent upon claim 7. As discussed in the foregoing, Oravala fails to disclose or suggest every limitation of amended claim 7. Therefore, Applicants believe that claims 10-14 are allowable at least for the reason that they are dependent upon an allowable base claim.

Claim 32 was rejected as being unpatentable over Oravala (US Patent 5,638,250) and Hastings et al. (US Patent 4,748,915). Applicants respectfully traverse the Examiner's determination. Claim 32 of the present invention recites, in part, "...a biasing member configured to apply a tension force longitudinally to at least one of the wire members at the connection point..." As discussed in the foregoing, Oravala fails to disclose or suggest this limitation. Therefore, Applicants believe claim 32 is patentable over Oravala and Hastings et al.

With regards to claim 33, Applicants respectfully traverse the Examiner's rejection, and submit that claim 33 is patentable at least for the reason that it is dependent upon an allowable base claim.

In view of the foregoing, reconsideration and withdrawal of the rejections under 35 U.S.C. § 103 is respectfully solicited.

### **New Claims**

New claims 34 and 35, both of which are dependent upon claim 1, are supported at least in part by the last sentence of paragraph [0031] of the application as originally filed. No new matter has been added. Therefore, Applicants submit that claims 34 and 35 are in condition for allowance in their present form.

### **CONCLUSION**

Pending claims 1, 3-7, 9-15, and 32-35 in the present application are believed to be in condition for allowance. Reconsideration and prompt passage of the application to allowance is respectfully solicited.

Respectfully Submitted,

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